Reference: GN Docket No. 12-268

October 30, 2013

Via Electronic Filing

Federal Communications Commission 445 12th Street S.W., Washington, DC. 20554

RE: GN Docket No. 12-268 Media Bureau Seeks Comment on Catalog of Eligible Expenses and other issues related to the Reimbursement of Broadcaster Channel Reassignment Costs

Below are comments of Radio Frequency Systems, in support of Catalog Of Eligible Expenses And Other Issues Related To The Reimbursement Of Broadcaster Channel Reassignment Costs

Background

Radio Frequency Systems (RFS) is a global designer and manufacturer of cable, antenna and tower systems and passive RF conditioning modules, providing total-package solutions for broadcasters.

Potential ways to mitigate costs associated with channel reassignment

"Broadcasters may also realize cost savings, and other benefits, associated with tower co-location or sharing a broadband antenna or other facilities. Should the Commission encourage broadcasters seeking reimbursement from the Fund to pursue tower and antenna sharing arrangements and, if so, how?"

Recommendation:

Antenna sharing and tower co-location have been demonstrated to reduce capital expenditure and reduce adjacent channel interference issues. However in order to share a common antenna, the required antenna radiation pattern characteristics must be the same for each broadcaster that shares the antenna. RFS wishes to propose that during the frequency planning phase, to minimize the potential capital costs, consideration should be given to maximizing the use of common azimuthal patterns whenever possible for facilities that could potentially be co-located.

Respectfully submitted,

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